

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ENRIQUE OSORIO-FRANCO, on behalf of
himself and a class of similarly situated
investors,

Plaintiff,

v.

SPECTRUM PHARMACEUTICALS, INC.,
THOMAS J. RIGA, FRANCOIS J. LEBEL, and
NORA E. BRENNAN,

Defendants.

Case No.: 1:22-cv-10292

WILLIAM CUMMINGS, on behalf of himself
and a class of similarly situated investors,

Plaintiff,

v.

SPECTRUM PHARMACEUTICALS, INC.,
THOMAS J. RIGA, FRANCOIS J. LEBEL, and
NORA E. BRENNAN,

Defendants.

Case No.: 1:22-cv-10677

LUIS CARNEIRO, on behalf of himself and a
class of similarly situated investors,

Plaintiff,

v.

SPECTRUM PHARMACEUTICALS, INC.,
THOMAS J. RIGA, FRANCOIS J. LEBEL, and
NORA E. BRENNAN,

Defendants.

Case No.: 1:23-cv-00767

**NOTICE OF LUIS CARNEIRO’S MOTION FOR CONSOLIDATION
OF RELATED ACTIONS, APPOINTMENT AS LEAD PLAINTIFF,
AND APPROVAL OF SELECTION OF LEAD COUNSEL**

**TO THE CLERK OF THE COURT, ALL PARTIES, AND THEIR RESPECTIVE
ATTORNEYS OF RECORD:**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, the concurrently filed Declaration of Ira M. Press, Esq., the pleadings and other filings herein, and such other written or oral argument as may be permitted by the Court, Luis Carneiro (the “Movant”) hereby moves this Court, before the Honorable Valerie E. Caproni, United States District Court, Southern District of New York, Courtroom 443, Thurgood Marshall United States Courthouse, 40 Foley Square New York, NY 10007, pursuant to Section 21D(a)(3)(B) of the Securities Exchange Act of 1934, 15 U.S.C. § 78u-4(a)(3)(B), as amended by the Private Securities Litigation Reform Act of 1995, for the entry of an Order of the following: (i) consolidating the above-captioned actions; (ii) appointing Movant as Lead Plaintiff on behalf of a class consisting of all persons other than Defendants who purchased or otherwise acquired Spectrum Pharmaceuticals, Inc. common stock during the period July 27, 2020 through September 22, 2022, inclusive; (iii) approving Movant’s selection of the law firm of Berger Montague PC as Lead Counsel and Kirby McInerney LLP as Local Counsel for the Class; and (iv) granting such other and further relief as the Court may deem just and proper.

Dated: February 3, 2023

Respectfully submitted,

KIRBY McINERNEY LLP

/s/ Ira M. Press

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*Additional Counsel for Lead Plaintiff Movant, Luis
Carneiro*

CERTIFICATE OF SERVICE

I hereby certify that on February 3, 2023, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/ Ira M. Press

Ira M. Press